

## **Remarks**

### **I. Administrative Overview**

Claims 1-24 were previously presented. Claims 1, 8, 11, 13, 20 and 22 have been amended; and Claims 7 and 19 have been cancelled. Claims 25 and 26 are newly added claims. Upon entry of the present amendments Claims 1-24 are pending of which Claims 1 and 13 are independent. No new matter has been added.

Applicants respectfully request reconsideration and withdrawal of all rejections levied against the pending claims.

### **II. Rejections under 35 U.S.C. § 103**

Claims 1-24 are rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent Number 6,484,206 to Crump et al. (“Crump”) in view of U.S. Patent Number 7,010,300 to Jones et al. (“Jones”) and in further view of U.S. Patent Number 6,065,120 to Laursen et al. (“Laursen”). Applicants respectfully submit that Claims 1-24 as previously presented are patentable over any combination of Crump, Jones and Laursen.

A demonstration of *prima facie* obviousness requires a showing that the cited references, either together or alone, teach or suggest each and every element of the claimed invention. Applicants respectfully submit that neither Crump, Jones nor Laursen teaches or suggests each and every element of the claimed invention because none of these references teaches re-establishing a first connection while maintaining a second connection between a first protocol service and a host service, or linking after a ticket is validated, the re-established first connection to the maintained second connection as required by independent Claims 1 and 13.

The Examiner admits that Crump does not teach or suggest re-establishing a first connection while maintaining a second connection between a first protocol service and a host service, or linking after a ticket is validated, the re-established first connection to the maintained second connection. *See* Office Action mailed March 4, 2009, page 3. Like Crump, Laursen also does not teach or suggest re-establishing a first connection while maintaining a second connection between a first protocol service and a host service, or linking after a ticket is validated, the re-established first connection to the maintained second connection. Rather, Laursen describes a system for self-provisioning through a first device to ensure secure access to

managed information and does not teach or even suggest re-establishing a first connection while maintaining a second connection. *See* Laursen, col. 1, lines 24-30. Thus, neither Crump nor Laursen teach or suggest each and every element of the claimed invention.

Jones describes a system that allows two mobile devices to transmit data back and forth through a central gateway by handing-off information between a first access system and a second access system. *See* Jones, Abstract; FIG. 1 and accompanying text. Jones does not describe re-establishing a first connection while maintaining a second connection between a first protocol service and a host service because handing-off an on-going communication session is not the same as maintaining a connection. Handing-off a communication session from one access system to another includes: (1) passing first-protocol data to a first access system; (2) receiving an instruction to hand-off the ongoing communication session; (3) switching modes so that the first-protocol data is passed to a second access system; and (4) translating the first-protocol data as needed to ensure that it is properly transmitted to the second access system. *See* Jones, col. 11, lines 1-20. After the hand-off, the mobile device communicates only via the second access system by encapsulating the first-protocol data as second-protocol data. *See* Jones, col. 11, lines 36-50. Thus, Jones does not even describe two different connections. Jones cannot teach or suggest re-establishing a first connection while maintaining a second connection because Jones does not teach or suggest a disrupted connection, thus there is no disrupted connection to re-establish.

Jones further fails to teach or suggest linking a re-established first connection with a second connection. As described above, Jones facilitates communication via either a first or second access system. Therefore Jones merely translates data from a first protocol to a second protocol and *vice versa* depending on which access system the mobile device uses to communicate. As stated before, Jones does not teach a disrupted connection and therefore cannot teach or suggest a re-established connection because the connection is never disrupted. For these reasons, Jones fails to teach or suggest linking a re-established first connection with a second connection. Jones therefore fails to teach or suggest each and every element of the claimed invention.

Claims 1 and 13 are patentable over any combination of Crump, Jones and Laursen because no combination of these references will teach or suggest each and every element of the

claimed invention. Claims 2-12 and 14-24 are also patentable over Crump in view of Jones and in further view of Laursen because Claims 2-12 and 14-24 depend on Claims 1 and 13. Accordingly Applicants respectfully request that the Examiner withdraw this rejection.

### **III. Conclusion**

Applicants contend that each of the Examiner's rejections has been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicants respectfully request reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' agent would expedite prosecution of this application; the Examiner is urged to contact the Applicants' agent at the telephone number identified below.

Respectfully submitted,  
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